

Network Telecom Inc.

(RESPORG ID ZXX-01)

FROM THE OFFICE OF MARK D. OLSON, ATTORNEY AT LAW
PRESIDENT & MANAGING DIRECTOR FOR THE CORPORATION
410 W. BADILLO STREET, 2ND FLOOR, COVINA CA 91723

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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Common Carrier Bureau
Network Service Division
Office of the Chief

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December 7, 1998

Federal Communications Commission
Common Carrier Bureau
Anna M. Gomez, Chief
Network Services Division
Washington, D.C. 20554

RE: RespOrg non-compliance
with 888 set-aside process

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
COPY VIA FAX

CC: Mr. Michael Wade
President, Database Service Management, Inc.
6 Corporate Place
Room PYA - 1F286
Piscataway, NJ 08854-4157

Dear Network Services Division:

We are in receipt of your RespOrg directive dated November 24, 1998. In that directive, Network Telecom Inc. (RespOrg Entity ID: ZX) is listed as having a 97.1% compliance rate with the 888 Right-of-First Refusal process.

As a newly admitted RespOrg (May 1998), we were not involved in setting aside 888 replicates. To date however, we have fulfilled a small number of 888 replication requests on behalf of subscribers who have "ported" their replicated 800 numbers over from other RespOrgs. Virtually all of these subscribers ported their numbers over to us because their previous RespOrgs were non-responsive to their repeated requests to activate their replicated 888 numbers. Upon receipt of their account, we promptly fulfilled each and every new order. It should be noted that the largest percentage of complaints came from subscribers of AT&T and MCI, both of whom have the powerful Mechanized Generic Interface, and certainly the means to promptly complete their subscribers requests.

As an SBA defined small business, and an SMS "dial-up" user, we have diligently processed each and every 888 request from our subscribers. We have reviewed our subscriber records, and related SMS reports, and we have not located any 888 replicates within our control that are now pending or require action on our part. Therefore, we have a good faith belief that the 2.9% "non-compliance" rate attributed to us, while it is admittedly relatively small in comparison to many other RespOrgs, nonetheless appears to be an erroneous statistic, and may be based upon one of two reasons:

(1) The 2.9% non-compliance may be derived from one or more 800/888 replicated numbers that were ported to our RespOrg immediately prior to the compilation of DSMI's non-compliance report; or

(2) The 2.9% non-compliance may be derived from one or more 800-555 numbers in which the Commission has issued a directive blocking replication of the 888-555 version pending further directive. We are not sure how DSMI has statistically classified these 888-555 numbers, which are presently

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impossible to replicate or take any further action at this time.

Network Telecom takes its responsibilities very seriously and has worked diligently to achieve 100% Customer Satisfaction, as well as 100% good faith compliance with F.C.C. rules, regulations and directives. Needless to say, we are a bit upset that the DSMI Non-Compliance Report does not accurately reflect what we believe should be 100% compliance. While the 2.9% figure may appear minor when compared to the 59.9% non-compliance record for MCI Worldcom, the 63.9% non-compliance record for AT&T, and the 64.9% non-compliance record for Sprint, we believe that our record should accurately reflect 100% perfect compliance with the 888 number Right-of-First Refusal process, and respectfully request that this record be accordingly amended.

Accordingly, we are sending a copy of this letter to DSMI and requesting such amendment and confirmation of our findings, or in the alternative, that the DSMI produce complete and accurate records that reflect what information they have that would account for 2.9% of 888 numbers that they claim to be outstanding and awaiting compliance. We have exhausted our records, and cannot locate any customer requests or records that indicate that there are any remaining 888 replicates awaiting further action on our part. And, at this point, there is no further action that we can take unless we hear otherwise from DSMI or the Commission.

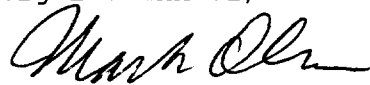
This letter is sent in accordance with your directive requiring a written response and explanation no later than December 11, 1998. We hope that this has been satisfactory. As stated earlier, we are an SBA defined small business entity, a small "dial-up" RespOrg user, and we take our legal responsibilities and obligations very, very seriously. We also have tremendous respect for the Federal Communications Commission's rules, regulations and directives, and sincerely desire to maintain our spotless record as a good RespOrg "citizen" in the SMS community. Therefore, we respectfully request that any negative records or reports reflecting the 2.9% non-compliance be appropriately amended to reflect our 100% perfect compliance with the 888 number Right-of-First Refusal process.

Please kindly feel free to direct any questions or other information to my office at 1-800-874-3333 (local voice: 626-915-3333 ext. 03), or via fax at 1-800-824-9999 (local fax: 626-331-1111). In closing, I want to thank you for your courtesy and kind attention to this letter, and also extend our many thanks to the F.C.C. for helping to make the SMS RespOrg system a fair and equitable system that provides opportunities and services to smaller business entities like Network Telecom.

Respectfully submitted,

NETWORK TELECOM INC.
(RespOrg ID: ZXX-01)

BY:



Mark D. Olson
Attorney at Law
President & Managing Director